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UNITED STATES DISTRICT COURT TO SUITION TO STATES DISTRICT OF MASSACHUSETTS DISTRICT OF MASSACHUSETTS

1.5 M -3 P 2:34

UNITED STATES

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NO. 05-CR-10003-NMG

DEEB HOMSI

MOTION FOR INTERIM BILLING

Counsel for the defendant Deeb Homsi respectfully moves this honorable court to allow interim billing in the above-captioned matter, quarterly pre-trial and monthly during trial. This is a complex 13-defendant organized crime case with voluminous discovery and intricate underlying facts, and will require many more hours of representation than the ordinary case. The trial is also expected to be lengthy. Counsel may experience financial hardship if interim billing is not permitted.

Respectfully submitted,

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DATED: April 30, 2005